

**U.S. BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re WAI KWAN LO PHUNG : CHAPTER 13**  
:  
**Debtor(s) : BANKRUPTCY NO. 24-12043**

**OBJECTION TO CERTIFICATION OF DEFAULT**

Debtor(s), Wai Kwan Lo Phung, by their attorney, Paul H. Young, Esquire, hereby objects to the Certification of Default filed by **The Bank of New York Mellon f/k/a The Bank of New York as Indenture Trustee for Newcastle Mortgage Securities Trust 2007-1** on February 14, 2025. Debtors believe they can become current on all post-petition payments due under the October 2, 2024 stipulation with the Lender.

Respectfully submitted,

/s/ Paul H. Young  
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